

Provided below are my comments on recommended changes to the interim rules on PUC 2600. It may not be possible to include all of these into the interim rules, but they may be helpful in future discussions on the final rules.

Unencumbered Funds: This will certainly require additional discussions on the time period as well as the definition of significant. However, I think the interim rules should at least clarify when the time period should begin. As it reads now, you are not sure what event triggers the "within the following 6 months" statement. Also it could be read that allocated funds that are projected to be used past a 6 month period of time should be refunded to the ratepayer. I believe the intention is to say that from the point in which the funds are received, the PUC has 6 months to allocate the funds to a program. If not, they are to be rebated to the ratepayer. I would suggest the wording be changed to: "If greenhouse gas emission reduction funds are not used or allocated to a project within 6 months of receiving the funds, the commission shall rebate such unencumbered dollars on a uniform per kWh basis to electric ratepayers."

Education: The eligible Energy Efficiency Programs for Greenhouse Gas Emissions Reduction Funds outline in PUC 2604 should specifically highlight educational programs. Possibly solution would be to add the word "Educational" in front of "Programs" in PUC 2604.01(b)(8). However it is recognized that by doing this, you would in essence limit other types of programs that are not "Educational".

Energy Audits: It should be referenced that eligible energy audits programs should be conducted by certified energy auditors. Building Performance Institute (BPI) could be used as the standard. This could be added into PUC rule 2602.06 (definition of Energy Audit) or PUC rule 2604.01(b)(1).

Grammatical Error: PUC 2605.01(a). The second line reads "and provide for the rebate to electric all ratepayers on a uniform..." All should be placed before electric.

Hope this helps in clarifying the rule.

Thanks,

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